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*Attorneys for Defendant Solana Labs, Inc.*

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MARK YOUNG, on behalf of himself and all others similarly situated,

**Plaintiff.**

V<sub>2</sub>

SOLANA LABS, INC., THE SOLANA FOUNDATION, ANATOLY YAKOVENKO, MULTICOIN CAPITAL MANAGEMENT LLC, KYLE SAMANI, and FALCONX LLC.

#### Defendants.

Case No.: 3:22-cv-03912-RFL

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING DEFENDANTS'  
TIME TO RESPOND TO CONSOLIDATED  
AMENDED CLASS ACTION COMPLAINT**

(Civil L.R. 6-1, 6-2, 7-12)

Hon. Rita F. Lin

1 Pursuant to Civil Local Rules 6-1 and 6-2, Lead Plaintiff Mark Young (“Plaintiff”),  
2 Defendants Solana Labs, Inc. (“Solana Labs”), Multicoin Capital Management LLC (“Multicoin”)  
3 and Kyle Samani (together with Solana Labs and Multicoin, “Defendants”, and collectively with  
4 Plaintiff, the “Parties”), by and through their respective counsel, hereby stipulate as follows:

5 **WHEREAS**, on January 12, 2024, Plaintiff filed his Consolidated Amended Class Action  
6 Complaint (“Amended Complaint”) (Dkt. 68);

7 **WHEREAS**, pursuant to the Court’s December 21, 2023 Order, the last day for Defendants  
8 to file their respective responses to the Amended Complaint is March 12, 2024, Plaintiff’s last day  
9 to respond to the anticipated motion(s) to dismiss is April 11, 2024, and Defendants’ last day to  
10 file replies in support of their anticipated motions to dismiss is May 13, 2024 (Dkt. 67); thus far,  
11 these are the only deadlines that have been set in this Action;

12 **WHEREAS**, no extensions have been requested or granted, and the Court has not stated  
13 that further extensions will not be granted;

14 **WHEREAS**, since the filing of the Amended Complaint, the Parties have engaged in a  
15 productive meet and confer process in an attempt to narrow the issues in dispute and minimize any  
16 overlap in the Defendants’ respective responses to the Amended Complaint;

17 **WHEREAS**, the Parties anticipate that Solana Labs will file a motion to dismiss the  
18 Amended Complaint, and Multicoin and Samani will jointly file a separate motion to dismiss, with  
19 each motion focusing as much as possible on issues and allegations unique to the respective  
20 Defendants;

21 **WHEREAS**, in the interest of efficiency and in recognition of the potential to narrow the  
22 issues further, the Parties have conferred and respectfully request that the Court extend the  
23 deadlines;

24 **IT IS ACCORDINGLY STIPULATED**, by and between the undersigned counsel for the  
25 parties, that subject to the Court’s approval:

26 1. Solana Labs and Multicoin and Samani shall file their respective responses to the  
27 Amended Complaint on or before April 11, 2024;

28

1           2. Lead Plaintiff shall file its opposition(s) to the anticipated motions to dismiss on  
2 or before May 13, 2024;

3           3. Defendants shall file their replies in support of their respective motion(s) to  
4 dismiss on or before June 12, 2024.

5  
6 DATED: February 13, 2024

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24          *Attorneys for Defendant Solana Labs, Inc.*

25          DATED: February 13, 2024

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6 *Counsel for Plaintiff Mark Young and the*  
7 *Proposed Class*

8 DATED: February 13, 2024

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17 *Attorneys for Defendants Multicoin Capital*  
18 *Management, LLC and Kyle Samani*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED  
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3 DATED: February 14, 2024



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Hon. Rita F. Lin  
United States District Court Judge

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## SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing  
Stipulation and [Proposed] Continuing Defendants' Time to Respond to Consolidated Amended  
Class Action Complaint. Pursuant to L.R 5-1(i)(3) regarding signatures, I, Morgan Whitworth,  
attest that concurrence in the filing of this document has been obtained.

DATED: February 13, 2024

/s/Morgan E. Whitworth

Morgan E. Whitworth